

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Cameron Simmons

Case No. Case: 2:24-mj-30447
Assigned To : Unassigned
Assign. Date : 10/17/2024
USA V. SIMMONS (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 16, 2024 in the county of Macomb in the
Eastern District of Michigan, the defendant(s) violated:

| <i>Code Section</i> | <i>Offense Description</i> |
|---------------------|--------------------------------------|
| 18 U.S.C. § 922(o) | Unlawful Possession of a machine gun |

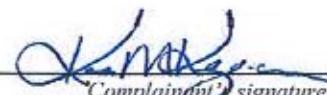
This criminal complaint is based on these facts:
see attached affidavit.

Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

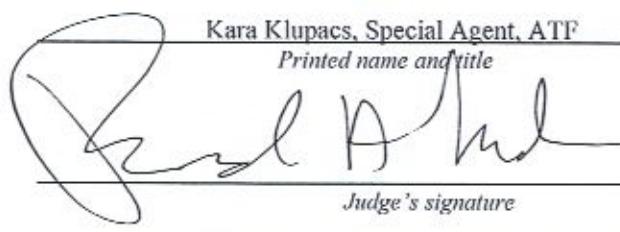
Date: October 17, 2024

City and state: Detroit, MI


Complainant's signature

Kara Klupacs, Special Agent, ATF

Printed name and title


Judge's signature

Hon. Bernard A Friedman, United States District Court Judge

Printed name and title

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Kara Klupacs, being first duly sworn, hereby state:

INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been since March 2018. I am currently assigned to the Detroit Field Division Group 1. I graduated from the Federal Law Enforcement Training Center and ATF Special Agent Basic Training. Prior to becoming an ATF Special Agent, I served eight years as a U.S. Customs and Border Protection and U.S. Secret Service Uniformed Division Officer. During my employment with ATF, I have conducted and/or participated in dozens of criminal investigations involving the possession and use of firearms, armed drug trafficking, criminal street gangs, and other state and federal offenses. I have obtained numerous federal search warrants for residences, vehicles, social media accounts, cell phones, and other electronic storage devices, and fully participated in those searches.

2. This affidavit is made in support of a criminal complaint for Cameron Jacob SIMMONS (DOB: XX/XX/2005). Probable cause exists that SIMMONS unlawfully possessed a machinegun on or about October 16, 2024,

within the Eastern District of Michigan in violation of 18 U.S.C. § 922(o).

3. I make this affidavit based on my participation in this investigation, reports from other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

4. The information in this affidavit is for the limited purpose of establishing probable cause and does not contain all details or all facts relating to this investigation.

PROBABLE CAUSE

5. In August of 2023, HSI New England – Boston’s (“HSI NE”) Cyber Crimes Group began targeting multiple Clearnet websites that are offering the illegal sale and importation of machinegun conversion devices (MCDs) (firearms under the National Firearms Act (NFA)) in violations of 26 U.S.C. § 5844 (illegal importation of NFA weapons into the United States) and 18 U.S.C. § 922(o) (illegal transfer and possession of a machinegun).

6. Between July 2024 and September 2024, HSI agents acting in undercover capacity conducted several purchases from the website DHGate.com (“WEBSITE 1”), who hosts vendors selling various prohibited items (including known and suspected MCDs, or “Glock Switches”). Through information developed by these undercover purchases, HSI NE has identified two vendors

illegally selling NFA weapons (to include MCDs) operating on WEBSITE 1.

These vendors are “dprk” and “partprinter”.

7. In August 2024, HSI NE received certain order information from WEBSITE 1 pertaining to the two targeted vendors. The order information consists of, among other things, the names, shipping address, and telephone number of U.S. based customers who are believed to have purchased illegal NFA weapons from these vendors between April 2024 – August 2024.

8. During the investigation HSI NE observed while ordering MCDs in an undercover capacity from the target vendors on WEBSITE 1 that parcels found to contain MCDs that were shipped from the target vendors (“suspect parcels”) were noted to have been shipped domestically with customer location name “ZDA Express”. Furthermore, the suspect parcels listed a customer reference number starting with the prefix “SHES”. Additionally, HSI NE noted that displayed on the top right corner of the labels of suspect parcels would be a reference number linking the shipment to WEBSITE 1. This reference number would start with prefix “JSMY-JS”.

9. On September 16, 2024, I reviewed a list containing purchaser information provided by HSI that had been placed to the two targeted vendors “dprk” and “partprinter” that were confirmed to engage in the illicit sales of NFA

weapons. I observed the following three orders that had been completed by purchaser “Cam bands”, detailed below:

- a. On June 21, 2024, purchaser Cam bands ordered “Automatic Printer Supplies FC stainless made of long lasting”. Purchaser information included the shipping address of 14516 Glenwood St., Detroit, Michigan, and phone number 313-439-9392.
- b. On June 22, 2024, purchaser Cam bands ordered “Automatic Printer Supplies FC stainless made of long lasting”. Purchaser information included the shipping address of 14516 Glenwood St., Detroit, Michigan, and the phone number 313-439-9392.
- c. On June 25, 2024, purchaser Cam bands ordered “Automatic Printer Supplies FC stainless made of long lasting”. Purchaser information included the shipping address of 14516 Glenwood St., Detroit, Michigan, and the phone number 313-439-9392.

10. On September 17, 2024, I contacted United States Postal Inspection Service (USPIS) for information regarding any deliveries of parcels to 14516 Glenwood that met the criteria observed by HSI NE. USPIS confirmed that on June 21, 2024, one parcel with tracking number 92144903630801186708578062 was shipped from Pomona, California to “Cam bands” of 14516 Glenwood, Detroit, Michigan with a delivery date of June 24, 2024. Additionally, USPIS

advised that this parcel was linked to customer reference number SHESH8164053542YQ and customer location name ZDA Express. I am aware from HSI that suspect parcels with a customer location name of ZDA Express and with customer reference numbers with the prefix SHES were previously observed on the orders of MCDs placed by HSI Special Agents acting in an undercover capacity. USPIS then provided a scanned image of the label of the shipped parcel. I observed in the top right corner of the label of the shipped parcel the reference number "JSMY-JS-004*1". I am aware from HSI that MCDs ordered by Special Agents acting in an undercover capacity were reported to have been affixed with labels with reference numbers prefixed with JSMY-JS.

11. On September 16, 2024, Detroit Police Department (DPD) 9th Precinct Officer Klanke queried the address 14516 Glenwood in the Detroit Police Report Management System (RMS) and discovered the address at the time was affiliated with Cameron SIMMONS (B/M, DOB: XX/XX/2005). Additionally, I queried the phone number 313-439-9392 in the law enforcement databases, Accurint and TLO. I observed in both databases that the phone number was associated with Cameron SIMMONS.

12. Independently as part of their own investigation, on August 19, 2024, DPD 9th Precinct Officer Holmes reviewed the publicly assessable social media postings made by the Instagram account bearing handle loaffyyp_, an account

associated with P.S., a juvenile whose identity is known to me (B/M, DOB: XX/XX/2006). I am aware from my review of police incident reports, as well as my knowledge of the investigation to date, that P.S. is related to Cameron SIMMONS.

13. During review of the Instagram “highlights” section of the loaffyyp_ account, Officer Holmes observed that the account holder (P.S.) posted images on or about July 4, 2024, of a Glock pistol with an affixed suspected MCDs (Glock switch). A Glock conversion device—commonly referred to as “Glock Switch” or “Glock Auto Sear”—is a part, or combination of parts, designed and intended for use in converting a semiautomatic Glock pistol into a machinegun; therefore, it is also “machinegun” under the NFA. Pursuant to ATF rulings and regulations, “Glock Switches” in and of themselves have been classified as machineguns pursuant to the definition appearing in 26 U.S.C. § 5845(b). Further, the Gun Control Act, 18 U.S.C. § 922(o), prohibits the transfer or possession of a machinegun manufactured after May 19, 1986. ATF is not aware of any Glock conversion devices that were developed before May 19, 1986. As such, Glock conversion devices are considered post-1986 machineguns. Therefore, they may only be lawfully possessed by properly licensed Federal Firearms licensees who have paid the appropriate Special Occupational Tax required of those manufacturing, importing, or dealing in NFA Weapons under the authority of the

United States and any department or agency thereof or a State or a department, agency, or political subdivision thereof. *See* 18 U.S.C. § 922(o).

14. On or about August 28, 2024, Officer Holmes obtained a state search warrant for the Instagram account loaffyyp_ which was subsequently executed and served to Meta. During review of records obtained from Meta, Officer Holmes observed that on July 5, 2024, the loaffyyp_ account holder (P.S.) shared numerous images depicting three individuals, including Cameron SIMMONS in possession of firearms. These images were shared in a group chat between Instagram account holders loaffyyp_, scamtw_ and biggest_dub. I observed in the group chat messages that the account holder of the scamtw_ account was referred to as “Cam”.

15. Independently, I reviewed the images of the individual identified by DPD as Cameron SIMMONS in the photos shared to the group chat on July 5, 2024, (reference image 1 below), to the Michigan Secretary of State image of Cameron SIMMONS issued in August 2023 (reference image 2 below). I observed the images appeared to be of the same individual. During review of the images shared to the group chat, Officer Holmes observed the individuals to be in possession of two Glock pistols with affixed suspected MCDs (Glock switches) and an AR type rifle. The suspected MCDs are depicted in image 3, and image 4 below (Cameron SIMMONS and the suspected MCD are circled in red in image 3

below). While reviewing the images I observed Cameron SIMMONS to have distinct tattoos on his forearms (an AK pistol style firearm on his right inside forearm and the word “humble” on his left outside forearm). Image 5 below depicts a close up of image 4, showing the Glock with a suspected MCD in Cameron SIMMONS’ hand (based on the forearm tattoo).

Image 1

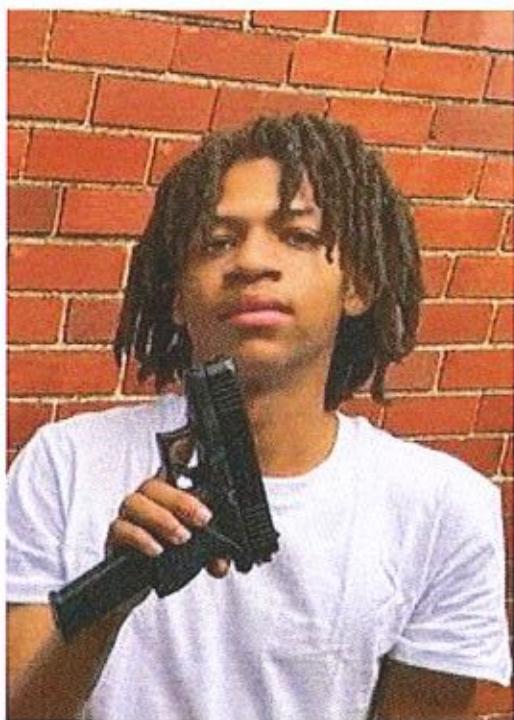


Image 2



Image 3



Image 4

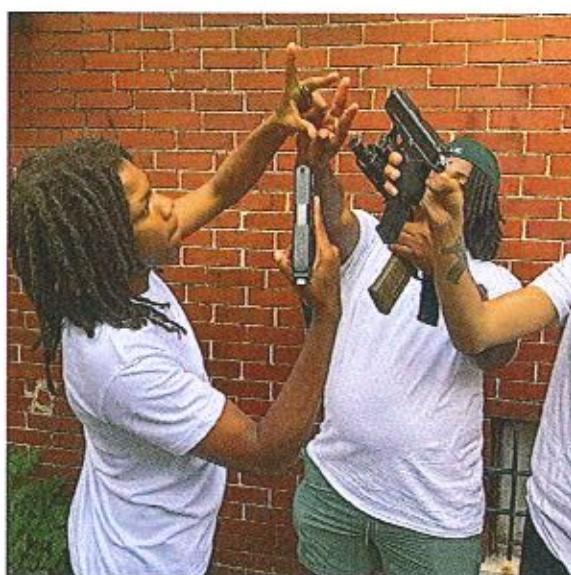


Image 5



16. On September 26, 2024, I obtained a federal search warrant for the location data affiliated with the cellular device with call number 313-439-9392 (2:24-mc-51128-1), which is the number associated with the purchase orders of suspected MCDs described above in paragraph 9a, b, and c. This warrant was served to cell service provider AT&T.

17. Between September 26, 2024 and October 9, 2024, ATF conducted surveillance and reviewed the geolocation information for the cellular device with call number 313-439-9392. During this time, ATF found that during the late night and early morning hours (3:00 a.m., and 8:00 a.m.) SIMMONS appeared to primarily reside at the address 5274 Argyle Court in Sterling Heights, MI.

18. On October 15, 2024, I obtained a federal search warrant for SIMMONS' residence, 5274 Argyle Court, Sterling Heights, MI, within the Eastern District of Michigan and for the cellular device associated with call number 313-439-9392 (24-MC-51128-03). On October 16, 2024, ATF executed the federal search warrant. During the warrant execution ATF agents encountered and called out Cameron SIMMONS and J.T. (B/F, DOB: XX/XX/2006, an adult person whose identity is known to me) with their infant child from the south bedroom. J.T. was also in possession of a purple in color cellular phone that was in her hands when she was called out from the bedroom. This phone was found to not be the cellular device with call number 313-439-9392.

19. After the residence was secured, a systematic search was conducted and the following items were located in the south bedroom:

- a. One (1) black Glock 27 .40 caliber pistol with an affixed MCD bearing serial number GVY215, loaded with an extended magazine containing 23 rounds of .40 caliber ammunition, including one in the

chamber, located in a diaper box, and recovered by Special Agent Smilo.

i. I observed the Glock model 27 recovered is a subcompact Glock pistol with an extended magazine, similar to the subcompact Glock pistol observed in SIMMONS' possession in the July 5, 2024, Instagram group chat. The recovered Glock model 27 is depicted in Images 6, 7, and 8 below.

Image 6



Image 7

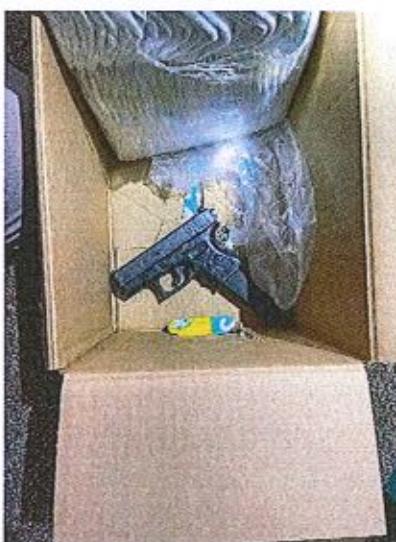
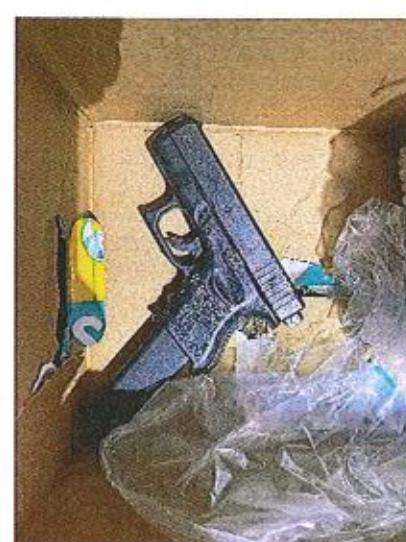


Image 8



b. One (1) white Apple iPhone in a seafoam green case with call number 313-439-9392, located on the bed and recovered by Special Agent Weston.

i. Prior to recovering the phone, I utilized my government issued cellular device to call phone number 313-439-9392. During

this time, I observed the white Apple iPhone in a seafoam green case device registered an incoming call from my device.

20. Special Agent Weston and I advised J.T. of her *Miranda* rights. J.T. acknowledged that she understood her rights and voluntarily agreed to waive her rights. During the interview, J.T. advised agents of the following:

- a. The residence is the primary residence of Cameron SIMMONS, the father of her child. She resides at the location some days, but also stays at her mother's residence.
- b. She identified the south bedroom as Camerons SIMMONS' room where she also stays when she's visiting with him.
- c. She does not have any firearms or have any knowledge of any firearms at the residence. Any firearms recovered at the residence do not belong to her.

21. Special Agent Weston and I advised Cameron SIMMONS of his *Miranda* rights, at which point SIMMONS requested a lawyer. The interview was immediately terminated. I observed that SIMMONS had tattoos on his forearms, including an AK pistol, and the word "humble", consistent with those described above in paragraph 15.

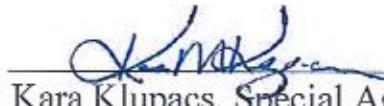
22. While on scene, ATF Special Agent Weston examined the Glock model 27 with suspected affixed MCD. In addition to basic ATF training, Special

Agent Weston is a graduate of a specialized course on privately made firearms (“PMF”) and machinegun conversion devices (“MCD”). Special Agent Weston has provided instruction to DPD officers, ATF Special Agents, sheriff deputies, state troopers, and Task Force officers on the identification of PMFs and MCDs. Special Agent Weston has experience in the investigation, seizure, and examination of dozens of PMFs and MCDs. After viewing the device affixed to the recovered Glock model 27, Special Agent Weston confirmed that the device appeared to be a machinegun conversion device (MCD), colloquially referred to as a “Glock Switch.”

CONCLUSION

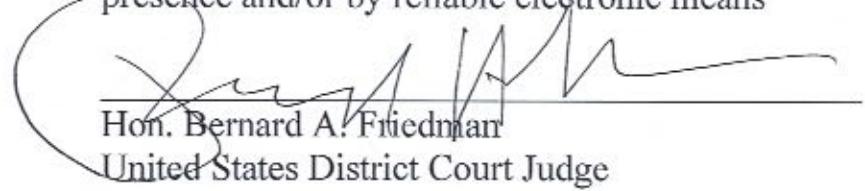
23. There is probable cause to believe that on October 16, 2024, within the Eastern District of Michigan, Cameron SIMMONS unlawfully possessed a machinegun in violation of 18 U.S.C. § 922(o).

Respectfully submitted,



Kara Klupacs, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means



Hon. Bernard A. Friedman
United States District Court Judge

Date: 10/17/2024